
North Coast Regional Water Quality Control Board

December 18, 2013

Henry Mikus
Executive Director
SCWMA
2300 County Center Drive, Suite B-100
Santa Rosa, CA 95403

Dear Mr. Mikus

On October 7, 2013, we received your response to our August 30, 2013 request for clarification regarding your Discharge Compliance Plan for the Central Compost Site. David Leland has been in contact with you regarding your response. This letter follows up on that conversation, and includes a few additional comments and requests.

Your response reports positive progress on various efforts related to reducing runoff volumes and improving the quality of wastewater that will be discharged from the site in the interim period as you work towards zero discharge. Specifically:

1) Best Management Practices

You report that in addition to sediment traps at the low end of the facility, you have installed several additional sediment traps, diversion structures to reroute run-on water away from active compost piles, and straw devices at the ends of each windrow. Please continue this effort; we would like you to observe and monitor your BMPs during and following runoff events this winter to assess effectiveness and identify and implement adaptive management measures to improve effectiveness of the system.

2) First Flush Capture

You report that you have looked into capturing first flush runoff and that it appears feasible to capture the first 200,000 gallons of runoff from storm events. Your response letter indicates that you were working on a plan to deal with 200,000 gallons of "first flush" for "any given storm event." Can you confirm that you intend to capture up to 200,000 gallons of first flush runoff from each storm event occurring during this rainy season, or clarify your expectations and plans if this assumption is not correct? The more runoff you can prevent from discharging to

surface waters this winter, the better; we encourage you to implement the proposed first flush capture and disposal system as soon as feasible.

3) Additional Storage Capacity

You have advised us in your May 2013 Proposed Discharge Compliance Plan and subsequent correspondence of your plans to investigate, site, design, construct, and develop additional storage capacity for wastewater runoff from the compost area on the Central Disposal Site property, and I understand that you advised Mr. Leland that your investigations are underway. Please continue this effort; the sooner you can devise a system that prevents compost wastewater from discharging to surface waters, the better.

4) Emptying Pond System Between Storms

You report that you have routinely and will continue to pump accumulated water from pond SP-4 between storm events for use onsite for compost processing and dust control. Please continue this effort; as stated above, the more runoff you can prevent from entering surface waters, the better.

5) Material Screening and Quality Control

You report that you currently screen incoming material manually and inspect incoming loads, and that you are pursuing plans to install a sorting line and to conduct education and outreach efforts to encourage feedstock generators to keep undesirable materials out their compost waste stream. Please continue this effort; for the period that wastewater from the compost facility continues to discharge to surface waters, the more you can do to improve its quality, the better.

6) Pond Aeration

You have mentioned to us and provided us with your plans to aerate accumulated wastewater in an effort to reduce odors. We understand that you also have submitted these plans to the Sonoma County Department of Health Services acting as Local Enforcement Agency (LEA) for review and approval. We will defer to the Department to comment on the merits of the proposal with respect to odor control. With respect to water quality, we note that the sedimentation pond was designed to settle out compost solids and fines/dirt as a primary settling pond, so it would be advisable to investigate whether circulation associated with aeration will serve to put solids back into suspension, consequently leading to increased solids being discharged from the pond. Would it be more appropriate to place aerators in ponds subsequent to the primary sedimentation pond? Regardless of where you choose to place the aerators, we hope that it proves effective in reducing odors, and we request that prior to system operation you develop and submit to us for review and concurrence a sampling plan to characterize pond water before and after employing aeration to assess whether there are any changes that would represent a water quality concern.

You mention that you have sampled and had compost contact water tested, in the process of characterizing that waste for discharge to the leachate pipeline. Please provide any

available sampling/test data as well as any information about the sampling location(s), nature of the water being applied to the compost material (e.g., recycled leachate, stormwater, clean water, etc.), and weather conditions at the time of sampling.

You have asked what Regional Water Board staff consider to be “high waste strength feedstocks.” In general, those feedstocks (or amendments) would be materials whose leachate includes additional or higher concentrations of pollutants as compared to leachate derived strictly from composted green waste material. You know your materials and operations better than we do, and perhaps we are not employing the proper phrasing here, but given that discharges of any leachate/contact water from the compost area to the waters of Stemple Creek are prohibited, and that those discharges that have and will continue to occur until you have achieved zero discharge may include pollutants that could adversely impact water quality and beneficial uses, consider which of the components of your feedstock and amendments may be sources of higher levels of BOD, bacteria, nutrients, or other pollutants relative to others, and try to isolate those materials to the extent that you can from contacting runoff that leaves the site.

We will be sharing your response with the County, the LEA, and Republic, and discussing with them hurdles that you have identified with which they may be able to assist you and us in further timely progress towards zero discharge. In the meantime, we encourage you to continue implementing the measures you have reported to us, and to continue to seek further opportunities for improving and reducing your discharges. As noted above, we would like you to develop and submit to us monitoring plans and testing data, specifically: 1) a plan to monitor and assess the effectiveness of the proposed BMPs and to adapt or add BMPs as necessary to improve runoff quality prior to discharge to ponds; 2) a plan to sample and test pond water before and after aeration in order to confirm that aeration is not causing any adverse changes that would make pond discharges more detrimental to downstream water quality and beneficial uses; and 3) any available information about current compost site leachate characteristics. Please provide these plans and information by January 10, 2014. Finally, we request an opportunity to visit the site in the near future to review operations and your efforts underway. Please contact me at (707) 576-2350 to schedule a site visit and to discuss any questions you may have regarding this matter.

Sincerely,

Original Signed By

Diana Henriouille Gonzalez, Chief
Land Disposal, Enforcement, and Grants Unit

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